



BONJEAN
LAW GROUP, PLLC

303 Van Brunt Street, 1st Floor
Brooklyn, New York 11231

53 W Jackson Blvd, Suite 315
Chicago, Illinois 60604

Tel: 718.875.1850
Fax: 718.230.0582

www.bonjeanlaw.com

May 11, 2025

Via ECF

Honorable Diane Gujarati
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

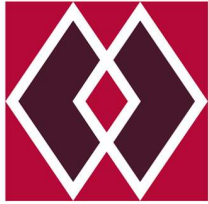
Re: United States v. Nicole Daedone and Rachel Cherwitz, 23-CR-146

Dear Judge Gujarati:

Defendants respectfully request that at 9:00 a.m. on Monday, May 12, 2025, this Court address a number of evidentiary questions raised by their recent filings and raised in their prior motions *in limine* that were never definitively ruled on. Defendants also need to raise certain motions in connection with upcoming testimony of a complainant. Defendants are entitled to resolve issues outside the presence of the jury since this Court refuses to conduct sidebars and has repeatedly signaled to the jury her contempt for the Defense when ruling on legitimate objections that Defendants must raise consistent with their Sixth Amendment obligations. Moreover, the Court's failure to provide definitive rulings on the parties' motions *in limine* require Defendants to renew objections before the jury that are, in many cases, complicated and require more than a simple one-word basis.

General objections do not preserve issues for appellate review. Fed. R. Evid. 103. "To preserve an evidentiary claim on appeal, a party must 'timely object[]' the specific ground, unless it [is] apparent from context'" *United States v. Williams*, 930 F.3d 44, 64 (2d Cir. 2019). When a party objects to the admission of evidence at trial but does not state the specific grounds, "he fail[s] to preserve that claim for appeal" and the Court of Appeals "review[s] it only for plain error." *United States v. Buyer*, 2025 U.S. App. LEXIS 6390, *4 (2d Cir. March 19, 2025).

Respectfully submitted,



BONJEAN
LAW GROUP, PLLC

303 Van Brunt Street, 1st Floor
Brooklyn, New York 11231

53 W Jackson Blvd, Suite 315
Chicago, Illinois 60604

Tel: 718.875.1850
Fax: 718.230.0582

www.bonjeanlaw.com

s/JENNIFER BONJEAN

Jennifer Bonjean

One of the attorneys for Nicole Daedone

Bonjean Law Group, PLLC

303 Van Brunt Street, 1st Floor

Brooklyn, NY 11231

718-875-1850

/s/CELIA A. COHEN

/s/MICHAEL P. ROBOTTI

Celia A. Cohen

Michael P. Robotti

Counsel for Rachel Cherwitz

Ballard Spahr, LLC

1675 Broadway, 19th Floor

New York NY 10019

212-223-0200